

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**Holding a Criminal Term**

**Grand Jury Sworn in on November 15, 2007**

<b>UNITED STATES OF AMERICA,</b>	:	<b>CRIMINAL NO.</b>
	:	
	:	
<b>v.</b>	:	<b>GRAND JURY ORIGINAL</b>
	:	
<b>REX PELOTE, Sr.,</b>	:	<b>VIOLATIONS: 21 U.S.C. §846</b>
<b>also known as Shadow;</b>	:	<b>(Conspiracy to Distribute and Possess With</b>
<b>GERALD ANDERSON,</b>	:	<b>One Kilogram or More of Heroin),</b>
<b>also known as Orleans;</b>	:	<b>21 U.S.C. §841(a)(1) and §841(b)(1)(C)</b>
<b>ALONSEZA LORETTA BELT,</b>	:	<b>(Unlawful Distribution of Heroin);</b>
<b>also known as Loretta;</b>	:	<b>21 U.S.C. §841(a)(1) and §841(b)(1)(C)</b>
<b>CORNELIUS FARLEY,</b>	:	<b>(Unlawful Distribution of Cocaine Base);</b>
<b>also known as Chuck;</b>	:	<b>21 U.S.C. §841(a)(1) and §841(b)(1)(A)(iii)</b>
<b>EDWARD TYRONE FARLEY,</b>	:	<b>(Unlawful Possession With Intent to</b>
<b>also known as Bootsy;</b>	:	<b>Distribute 50 Grams or More of Cocaine</b>
<b>DANNIE JONES,</b>	:	<b>Base);</b>
<b>also known as Smiley;</b>	:	<b>21 U.S.C. §841(a)(1) and §841(b)(1)(C)</b>
<b>LINDA CRAWFORD JONES,</b>	:	<b>(Unlawful Possession With Intent to</b>
<b>also known as Bridget; and</b>	:	<b>Distribute Cocaine Base)</b>
<b>CHARLES McRae;</b>	:	<b>21 U.S.C. §841(a)(1) and §841(b)(1)(C)</b>
<b>also known as Black.</b>	:	<b>(Unlawful Possession With Intent to</b>
	:	<b>Heroin) and</b>
	:	<b>21 U.S.C. §843(b)</b>
<b>Defendants</b>	:	<b>(Unlawful Use of a Communications Facility).</b>

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

From at least April 10, 2007 up to and including April 15, 2008, within the District of Columbia and elsewhere, **REX PELOTE Sr., also known as Shadow; GERALD ANDERSON, also known as Orleans; ALONSEZA LORETTA BELT, also known as Loretta; CORNELIUS FARLEY, also known as Chuck; EDWARD TYRONE FARLEY, also known as Bootsy;**

**DANNIE JONES, also known as Smiley; LINDA CRAWFORD JONES, also known as Bridget; and CHARLES MCRAE, also known as Black** and co-conspirators not indicted herein, did knowingly and willfully combine, conspire, confederate and agree together and with other persons both known and unknown to the Grand Jury, to unlawfully, knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance and the amount of said mixture and substance was one kilogram or more, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i).

**(Conspiracy to Distribute and Possess With Intent to Distribute one Kilogram or more of Heroin, in violation of Title 21, United States Code, Section 846)**

**COUNTS TWO TO TWENTY-ONE**

On or about the dates set forth below, within the District of Columbia, the defendants named below did unlawfully, knowingly, and intentionally use a communications facility, that is a telephone, to facilitate the conspiracy to unlawfully distribute and possess with the intent to distribute heroin in violation of Title 21, United States Code, Section 846.

<u>Count</u>	<u>Call</u>	<u>Date</u>	<u>Defendant</u>
2	EF 178	Jan.10, 2008	EDWARD FARLEY and CORNELIUS FARLEY
3	EF 179	Jan. 10, 2008	EDWARD FARLEY and CO-CONSPIRATOR
4	EF 292	Jan.11, 2008	EDWARD FARLEY and LINDA CRAWFORD JONES
5	EF 304	Jan.12, 2008	EDWARD FARLEY and LINDA CRAWFORD JONES
6	EF 426	Jan.14, 2008	EDWARD FARLEY and LINDA CRAWFORD JONES
7	EF 728	Jan.18, 2008	EDWARD FARLEY and LINDA CRAWFORD JONES
8	EF 832	Jan. 19, 2008	EDWARD FARLEY and REX PELOTE, Sr.

9	EF 2313	Feb.9, 2008	EDWARD FARLEY and REX PELOTE, Sr.
10	EF 2423	Feb.11, 2008	EDWARD FARLEY and CORNELIUS FARLEY.
11	EF 2480	Feb.12, 2008	EDWARD FARLEY and GERALD ANDERSON
12	EF 2744	Feb.14, 2008	EDWARD FARLEY and GERALD ANDERSON
13	EF 2881	Feb.16, 2008	EDWARD FARLEY and CO-CONSPIRATOR
14	EF 3385	Feb.22, 2008	EDWARD FARLEY and GERALD ANDERSON
15	EF 3450	Feb. 22, 2008	REX PELOTE Sr. and CO-CONSPIRATOR
16	RP 503	March 31, 2008	REX PELOTE Sr. and CO-CONSPIRATOR
17	RP 647	April 1, 2008	REX PELOTE Sr. and CO-CONSPIRATOR
18	RP 914	April 3, 2008	REX PELOTE Sr. and CO-CONSPIRATOR
19	RP 920	April 3, 2008	REX PELOTE Sr. and CO-CONSPIRATOR
20	RP 1264	April 6, 2008	REX PELOTE Sr. and EDWARD FARLEY
21	RP 1334	April 7, 2008	REX PELOTE Sr. and EDWARD FARLEY

(Unlawful Use of a Communication Facility, in violation of Title 21, United States Code, Section 843(b))

### COUNT TWENTY-TWO

On or about April 7, 2008, within the District of Columbia, **REX PELOTE, Sr. and ALONSEZA LORETTA BELT**, did unlawfully, knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic

drug controlled substance.

**(Unlawful Possession With Intent to Distribute Heroin**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))

**COUNT TWENTY-THREE**

On or about February 2, 2008, within the District of Columbia, **EDWARD T. FARLEY**, did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

**(Unlawful Distribution of Heroin**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))

**COUNT TWENTY-FOUR**

On or about February 22, 2008, within the District of Columbia, **EDWARD T. FARLEY**, did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

**(Unlawful Distribution of Heroin**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))

**COUNT TWENTY-FIVE**

On or about February 29, 2008, within the District of Columbia, **EDWARD T. FARLEY**, did unlawfully, knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance, and the amount of said mixture and substance was 50 grams or more.

**(Unlawful Possession With Intent to Distribute 50 grams or more of Cocaine Base**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(iii))

**COUNT TWENTY-SIX**

On or about April 15, 2008, within the District of Columbia, **EDWARD T. FARLEY**, did

unlawfully, knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

**(Unlawful Possession With Intent to Distribute Heroin**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))

**COUNT TWENTY-SEVEN**

On or about April 10, 2007, within the District of Columbia, **CHARLES McRAE**, did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

**(Unlawful Distribution of Heroin**, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C))

**COUNT TWENTY-EIGHT**

On or about November 1, 2007, within the District of Columbia, **CHARLES McRAE**, did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

**(Unlawful Distribution of Heroin**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))

**COUNT TWENTY-NINE**

On or about November 16, 2007, within the District of Columbia, **CHARLES McRAE**, did unlawfully, knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

**(Unlawful Possession With Intent to Distribute Heroin**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))

### **COUNT THIRTY**

On or about November 16, 2007, within the District of Columbia, **CHARLES McRAE**, did unlawfully, knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II narcotic drug controlled substance.

**(Unlawful Possession With Intent to Distribute Cocaine Base**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))

### **COUNT THIRTY-ONE**

On or about February 21, 2008, within the District of Columbia, **CHARLES McRAE**, did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

**(Unlawful Distribution of Heroin**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))

### **COUNT THIRTY-TWO**

On or about May 31, 2007, within the District of Columbia, **GERALD ANDERSON**, did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

**(Unlawful Distribution of Heroin**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))

### **COUNT THIRTY-THREE**

On or about February 21, 2008, within the District of Columbia, **GERALD ANDERSON**, did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

**(Unlawful Distribution of Heroin**, in violation of Title 21, United States Code, Sections

841(a)(1) and 841(b)(1)(C))

**COUNT THIRTY-FOUR**

On or about February 21, 2008, within the District of Columbia, **GERALD ANDERSON**, did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

**(Unlawful Distribution of Heroin**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))

**COUNT THIRTY-FIVE**

On or about February 27, 2008, within the District of Columbia, **GERALD ANDERSON**, did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

**(Unlawful Distribution of Heroin**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))

**COUNT THIRTY-SIX**

On or about February 27, 2008, within the District of Columbia, **GERALD ANDERSON**, did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

**(Unlawful Distribution of Heroin**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))

**COUNT THIRTY-SEVEN**

On or about February 27, 2008, within the District of Columbia, **GERALD ANDERSON**, did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II narcotic drug controlled

substance.

**(Unlawful Distribution of Cocaine Base**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))

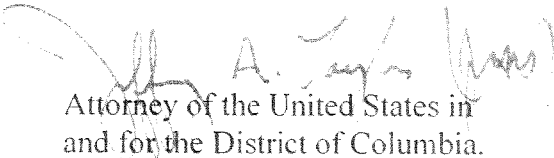
**COUNT THIRTY-EIGHT**

On or about February 15, 2008, within the District of Columbia, **DANNIE JONES**, did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

**(Unlawful Distribution of Heroin**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))

A TRUE BILL:

FOREPERSON.



Attorney of the United States in  
and for the District of Columbia.